



THE LAW OFFICES OF

# Richman Hill & Associates PLLC

2027 Williamsbridge Road, Bronx, NY 10461  
718.892.8588 | fax: 718.518.0674

Stacey Richman, Esq.  
srichmanlaw@msn.com

Renée C. Hill, Esq.  
rhillesq@msn.com

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## MEMORANDUM ENDORSED

July 31, 2024

Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: United States v. Juan Checo  
S6 22 CR 522 (GHW)  
Request for Alteration of Conditions of Release  
Adjustment in Arraignment Date from 8/8/24 to 8/6/24

Your Honor:

I look forward to my first appearance in this matter. I filed my notice this morning stepping in place of my friend, attorney Alain Massena.

I understand there is to be an arraignment on the sixth superseding indictment which due to Mr. Massena's vacation schedule was moved to August 8, 2024. I understand the balance of the arraignments were to be on August 6, 2024 at 11:30 a.m. Mr. Checo and I can be present for that original date. I have requested permission for Mr. Checo to come to Court on August 6, 2024. The appearance on August 8, 2024 will not be necessary.

Mr. Checo had made requests to go to the barber to ensure he was presentable for court and also to request times to take his 18 month old daughter to the park on certain days. Officer Lettieri noted that with an email he would make arrangements for Mr. Checo to see the barber. Further, as Mr. Checo has been so compliant, Pre-trial Officer Lettieri suggested that a curfew in combination with the already applied ankle monitor would be an appropriate modification. Pre Trial noted it had no objection to the broader freedom. The Government noted that it deferred to the guidance of Pre-trial.

Thus, we ask for a modification in accord with the suggestion of Pre-Trial Services in Mr. Checo's bail conditions from home confinement to a curfew as determined by Pre-Trial services.

Most respectfully,

Stacey Richman

cc:

AUSA Ashely Nicolas, [Ashely.Nicolas2@usdoj.gov](mailto:Ashely.Nicolas2@usdoj.gov)


Pre-Trial Officer Jonathan Lettieri, [Jonathan\\_Lettieri@NYSPT.uscourts.gov](mailto:Jonathan_Lettieri@NYSPT.uscourts.gov)

Application denied without prejudice. The information provided here does not provide a sufficient basis for the Court to conclude that the conditions of Mr. Checo's pre-trial release should be changed in a way that would make a less restrictive pre-trial release package appropriate. The consent to the modification by the Government and Pretrial Services is a useful data point, but is not dispositive. This application does not provide sufficient justification for the modification of the defendant's conditions of pretrial release as requested at this time.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 417.

SO ORDERED.

Dated: August 5, 2024

  
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GREGORY H. WOODS  
United States District Judge